

STATEMENT OF BASIS (AI No. 52157)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0108502 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Turn Services, Inc.
Mobile Midstream Cleaning Barge
2200 Royal Street
New Orleans, Louisiana 70117

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Molly Hebert

DATE PREPARED: May 2, 2006

1. PERMIT STATUS

A. Reason For Permit Action:

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES Permit Issuance Date: September 1, 1999
LPDES Permit Expiration Date: August 31, 2004

The facility ceased operation in 2003 and the previously issued LPDES permit expired on August 31, 2004. Turn Services has decided to reopen and resume barge cleaning activities. The original permit number will be reactivated.

C. LWDPDS permit - NA

D. Date Application Received: April 17, 2006

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – mobile barge cleaning and repair facility

Turn Services, Inc is resuming barge cleaning operations along the Mississippi River. The facility ceased operations in 2003 and allowed the permit to expire. Due to customer demand, they have decided to resume the business and are proposing to wash dry bulk cargo barges along either side of the Mississippi River between Mile 0 and 234, at any public or private dock, U.S. Coast Guard designated ship anchorage, or any privately owned mid-stream mooring facility.

Cleaning will consist of first scraping and sweeping the sides and bottoms of holds to remove any remaining cargo. Cargo remains recovered in the process are packaged and delivered to the owner's facility. Holds are then washed with river water from 110 GPM/175 psi portable pumps. If additional cleaning is required, holds are washed with river water by 15 GPM/3000 psi portable pumps. All water is discharged back to the river.

Barges cleaned at this facility include cement, cement clinker, steam coal, calcine coke, barite, iron ore, ilmenite (FeTiO_3), hematite, phosphate ore, whole grains, grain meals,

non-hazardous chemically manufactured fertilizers, granulated sugar, wood chip, and scrap steel dry commodity barges.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II as per LAC33:IX.1319 Table I and SIC 4463. In Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463
3. Wastewater Type: III
4. SIC code: 4491

C. LOCATION – At various locations on the Mississippi River between River Mile 0 and 234 MAHP at any public or private dock, U.S. Coast Guard designated ship anchorage, or any privately owned mid-stream mooring facility in Plaquemines, St. Bernard, Orleans, Jefferson, St. Charles, St. John the Baptist, St. James, Ascension, Iberville, East Baton Rouge and West Baton Rouge parishes.

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity barge washwater
Treatment: none
Location: at the point of discharge from the barge outlet, prior to combining with any other waters
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 002

Discharge Type: coal and/or coke barge washwater
Treatment: none
Location: sampled at the point of discharge from the barge outlet, prior to combining with any other waters
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 003

Discharge Type: ballast water (A = incoming ballast from customer barges; B = maintenance ballast from work, treatment, spar or office barges)
Treatment: none
Location: at the point of discharge from the appropriate barge, prior to combining with any other waters
Flow: intermittent
Discharge Route: to the Mississippi River

Other Discharges –

Stormwater will be addressed with standard barge BMPs.

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. fish and wildlife propagation
d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale on page 5.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

1. WQMD: There are no open, appealed, or pending OEC enforcement actions as of May 4, 2006.
2. DMR Review: A review of DMRs submitted under the previous LPDES permit, conducted on May 5, 2006, showed a satisfactory compliance history. No permit exceedances were noted.

7. 303(d) LISTED WATERBODIES

The discharges from Turn Services, Inc. are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Belmont Fleet, LLC

1. Outfall 001: dry commodity barge washwater

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities. Best Management Practices (BMPs) for barge operations are listed in Part II.

Treatment: none

BPJ Best Professional Judgment

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. Only hopper barges are cleaned. Per 40 CFR 442.1(b)2 wastewater from cleaning of closed-top hopper barges are specifically excluded.

2. Outfall 002: coal and/or coke barge washwater

| Pollutant | Limitation | | Reference |
|-----------|---------------|-----------|----------------------|
| | Monthly Avg | Daily Max | |
| | (mg/l) | | |
| Flow | Report:Report | | LAC 33:IX.2361.I.1.b |
| COD | 250:400 | | * |
| TSS | Report:Report | | * |
| pH | 6.0 - 9.0 su | | * |

Treatment: none

Monitoring Frequency: 1/week for Flow, COD, and pH, and 1/month for TSS at the point of discharge from the barge being washed

Limits Justification: limits are based on LDEQ practices for permitting coal and /or coke barge washwater.

3. Outfall 003A: incoming ballast water from customer barges

| Pollutant | Limitation | Reference |
|----------------|---------------------------------|----------------------|
| | Monthly Avg:Daily Max (mg/l) | |
| Flow | Report:Report | LAC 33:IX.2361.I.1.b |
| COD | ---:250 | * |
| Oil and Grease | ---:15 | * |
| pH | 6.0 - 9.0 su | * |

Treatment: none

Monitoring Frequency: 1/week at the point of discharge of incoming ballast water from customer barges

Limits Justification: limits are based on LDEQ practices for permitting ballast wastewater

Note: Hydrostatic test water may be discharged as ballast/void water provided: a) it is the ballast/void tanks being hydrostatic tested, and b) that no additives such as corrosion inhibitors, bactericides, and dyes are added to the test water.

su Standard Units

* LDEQ Office practices for permitting ballast wastewater

4. Outfall 003B: maintenance ballast water

| Pollutant | Limitation | Reference |
|----------------|---------------------------------|----------------------|
| | Monthly Avg:Daily Max (mg/l) | |
| Flow | Report:Report | LAC 33:IX.2361.I.1.b |
| COD | ---:250 | * |
| Oil and Grease | ---:15 | * |
| pH | 6.0 - 9.0 su | * |

Treatment: none

Monitoring Frequency: 1/month at the point of discharge of maintenance or dry dock ballast water. **(may be discharged without sampling provided there is no visible oil sheen)**

Limits Justification: limits are based on LDEQ Office practices for permitting ballast wastewater

Note: Hydrostatic test water may be discharged as ballast/void water provided: a) it is the ballast/void tanks being hydrostatic tested, and b) that no additives such as corrosion inhibitors, bactericides, and dyes are added to the test water.

su Standard Units

* LDEQ Office practices for permitting ballast wastewater